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December 31, 2019

Via ECF

The Honorable Judge Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

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The parties' joint request is GRANTED. The Initial Pretrial Conference in this matter is hereby ADJOURNED to May 1, 2020 at 3:45 p.m.

Re: Ralph Sanzari, in his capacity as General Chairman of the Association of Commuter Rail Employees, Division 1 v. Metro-North Railroad Company, 1:19-cv-08689-AJN

Dear Judge Nathan,

This firm represents defendant Metro-North Railroad Company ("Metro-North" or "Defendant") in the above-referenced matter. Please accept this letter motion, pursuant to Rule 1.D of Your Honor's Individual Rules of Practice in Civil Cases, to adjourn the Initial Pretrial Conference and filing of the Proposed Civil Case Management Plan and Scheduling Order and the accompanying joint letter.

The Initial Pretrial Conference is currently scheduled for January 10, 2020, and the Proposed Civil Case Management Plan and Scheduling Order and accompanying joint letter are due no later than seven days prior to the Conference.

The reason for this request is that Defendant seeks additional time to investigate the allegations in the Amended Complaint, which was filed on December 23, 2019, and both parties seek additional time to discuss a potential resolution to this matter outside of litigation. At Plaintiff's request, on December 23, 2019, Defendant executed a Waiver of the Service of Summons regarding the Amended Complaint, and its deadline to serve an answer or motion under Rule 12 is February 21, 2020.

Plaintiff's counsel has consented to this request. The parties have conferred regarding mutually agreeable alternate conference dates, and propose April 3, 2020, April 24, 2020, and May 1, 2020.

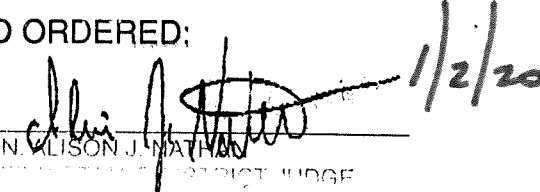
Defendant has not previously requested an adjournment. There are currently no other scheduled dates set forth in a Case Management Plan or Scheduling Order.

Respectfully submitted,

/s/ Neil H. Abramson
Neil H. Abramson

cc: Plaintiff's Counsel of Record (via ECF)

SO ORDERED:


HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE